UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Brandon W. Weiss

Case No.: 20-14005-elf

Debtor(s)

Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Brandon W. Weiss, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

- 1. Debtor filed a Chapter 13 Bankruptcy on October 7, 2020.
- 2. The Chapter 13 filing was assigned case number 20-14005.
- 3. The Chapter 13 Plan was confirmed by this Honorable Court on May 18, 2021.
- 4. Debtor believes that it is in his best financial interest to surrender his vehicle, 2011 Jeep Cherokee, to PNC Bank.
 - 5. Debtor wishes to modify his plan to surrender the vehicle.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: July 21, 2021

/s/Brad J. Sadek, Esq. Brad J. Sadek, Esq. Attorney for Debtor 1315 Walnut Street Suite #502 Philadelphia, PA 19107